

AO 91 (Rev. 11/11) Criminal Complaint

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT

for the
District of Vermont

2017 SEP 11 PM 1:05

United States of America

v.

Brian Tierney

Case No.

2:17-mj-83-1

BY

DEPUTY CLERK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 10, 2017 in the county of Chittenden in the
District of Vermont, the defendant(s) violated:

Code Section

18 U.S.C. § 2422(b)

Offense Description

using a facility of interstate commerce to knowingly persuade, induce, entice,
or coerce any individual who is not 18 years old to engage in prostitution or
any sexual activity for which any person can be charged with a criminal
offense

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Caitlin Moynihan

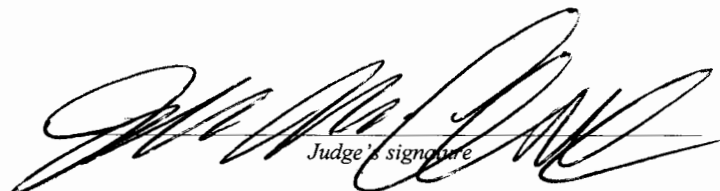
☒ Continued on the attached sheet.

Complainant's signature

Caitlin Moynihan, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/11/2017City and state: Burlington, Vermont

Judge's signature

Hon. John M. Conroy, U.S. Magistrate Judge

Printed name and title